SECTION 5

Previous Inspections

This section is reserved for any information regarding Inspections Conducted before December 14, 1987. 40 CFR Part 763 Subsection 93(2), requires the following,

(i) The date of the inspection.

(ii) A blue print, diagram, or written description of each school building that identifies clearly each location approximate square or linear footage of any homogeneous or sampling area where material was sampled for ACM, and if possible, the exact locations where bulk samples were collected, and the dates of collection.

(iii) A copy of the analysis of any bulk samples, dates of analysis, and a copy of any other laboratory reports pertaining to the analyses.

(iv) A description of any response actions or preventive measures taken to reduce asbestos exposure, including if possible, the names and addresses of all contractors involved, start and completion dates of the work, and results of any air samples analyzed during and upon completion of the work.

(v) A description of assessments, required to be made under subsection 763.88, of material that was identified before December 14, 1987, as friable ACBM or friable suspected ACBM assumed to be ACM, and the name and signature, State of accreditation, and if applicable, accreditation number of each accredited person making assessments.

LIBBY PUBLIC SCHOOLS
111 EAST LINCOLN BLVD.
LIBBY, MONTANA 59923

406-293-6204

September 26, 1988

Bruce Parker
Bison Engineering/Research
P.O. Box 1703
Helena, MT 59624

Dear Bruce:

Enclosed are copies of memos from previous asbestos related activities. The documents address ACBM in buildings that are no longer ours (Lincoln, Memorial Gym), besides the ones that are still our property.

I hope this will complete section 5 of the management plan.

Sincerely,

Bill

William M. Olson
Business Manager

ck

Enclosure

LIBBY PUBLIC SCHOOLS
111 EAST LINCOLN BLVD.
LIBBY, MONTANA 59923

406-293-6204

JUL 2 1 1986

July 16, 1986

TO: BOB PRATT

RE: ENCAPSULATION OF FRIABLE ASBESTOS IN LIBBY SCHOOLS

Encapsulation of asbestos has been completed according to EPA standards, as of July 15, 1986 in the following Libby Public Schools buildings:

Memorial Gymnasium - pipes in compressor room and gym proper

Lincoln Building - pipes in rooms and boiler room, and boiler

Central School - pipes and boiler

Asa Wood School - boiler.

BOB GREEN,
Maintenance Supervisor

BG:np

NOTICE TO SCHOOL EMPLOYEES

File

In accordance with EPA regulations, this school has been inspected for friable (easily crumbled) materials which contain asbestos. Friable asbestos-containing material may cause health problems.

Friable asbestos-containing material is present in

CENTRAL
(Name of School)

A record of the inspection, a diagram of the location(s) of friable asbestos-containing materials, and a copy of relevant EPA regulations are available in

Building	Room
MAINTENANCE	OFFICE

For further information, interested persons should call 800-424-9065 (554-1404 in the Washington, DC area).

Signed:

Bob Green

BOB GREEN
(Name)

MAINTENANCE SUPERVISOR
(Title)

MARCH 3, 1986
Date

EPA Form 7730-3 (6-82)
BILLING CODE 6560-50-C

NOTICE TO SCHOOL EMPLOYEES

File

In accordance with EPA regulations, this school has been inspected for friable (easily crumbled) materials which contain asbestos. Friable asbestos-containing material may cause health problems.

Friable asbestos-containing material is present in

ASA WOOD
(Name of School)

A record of the inspection, a diagram of the location(s) of friable asbestos-containing materials, and a copy of relevant EPA regulations are available in

Building	Room
MAINTENANCE	OFFICE

For further information, interested persons should call 800-424-9065 (554-1404 in the Washington, DC area).

Signed:

Bob Green

BOB GREEN
(Name)

MAINTENANCE SUPERVISOR
(Title)

MARCH 3, 1986
Date

EPA Form 7730-3 (6-82)
BILLING CODE 6560-50-C

File

March 6, 1986

TO: BOB PRATT, Superintendent

RE: PHONE CALL FROM TOM HARRIS, EPA/HELENA

I received a phone call from Tom Harris on March 6, 1986 in regard to the paint literature that I had sent him on sealing friable asbestos in Libby Public School buildings.

Tom would not recommend this particular kind of paint. He had sent the paint to the EPA testing lab, and it did not check out to EPA specifications. Harris will be sending me a list of sealings as soon as he receives a copy from his office.

I will keep you informed on this subject.

Thank you, Bob.

BOB GREEN,
Maintenance Supervisor

BG:np

cc: Bill Olson

file

February 6, 1986

Environmental Protection Agency
Federal Building - Drawer 10096
301 S. Park
Helena, MT 59626
ATTN: Mr. Tom Harris

Re: Asbestos in Libby Public Schools

Dear Mr. Harris:

In regard to our recent phone conversation concerning the asbestos in our schools, you suggested that we contact a boiler company about covering the asbestos.

We contacted Northwest Boiler, in Spokane, Washington, and they suggested that we paint the asbestos with MEI 44-20 (spec. is enclosed) in the following areas discussed during our conversation:

Lincoln Boiler Room
Central School Boiler Room
Lincoln Gymnasium (Memorial Gym).

We would like to hear from you at your earliest convenience, if the above mentioned paint would be satisfactory to cover the asbestos in our schools.

Yours truly,

BOB GREEN,
Maintenance Supervisor

ENCL.

BG:np

cc: Mr. Robert Pratt
Mr. Bill Olson

file

January 8, 1986

TO: BOB PRATT - Superintendent

RE: EPA Asbestos in Schools Regulations

Dear Bob:

This is in response to the friable asbestos material samples that were sent to Linda Hedstrom of the Missoula County Health Department.

Samples were taken at the following locations: Lincoln boiler room, Comm. Education Office, Lincoln Kitchen, Lincoln Gymnasium and Lincoln classrooms #11 and #13; the boiler room at Central School; Asa Wood boiler room; Libby High School boiler room.

This is in response to your phone conversation with Terry Lucas of the EPA in Denver, Colorado.

Samples have been made and sent off as of 1-8-86.

BOB GREEN,
Maintenance

BG:np

cc: Bill Olson - Business Manager

3. On May 22, 1985, Mr. Tom Harris, an authorized EPA inspector, conducted an inspection of the Respondent's schools in Libby, Montana to determine compliance with the asbestos in schools regulations, 40 C.F.R. Section 763.100 et seq.

4. The asbestos in schools regulations were promulgated under the authority of Section 6 of TSCA, 15 U.S.C. Section 2605, and required compliance by June 25, 1983.

5. Mr. Harris inspected the following schools: Central, Asa Wood Elementary, Libby Junior High School, Libby High School, Plummer Elementary School, and McGrade Elementary School.

6. Mr. Richard Pratt, the superintendent of schools for Respondent's district, informed Mr. Harris that there were no asbestos records in the district

7. During his inspection, Mr. Harris found friable material in the following locations: the boiler room, community education office, kitchen, gymnasium and several classrooms in the Lincoln Building and the boiler room in Central School; the boiler room in Asa Wood Elementary School; and the boiler room in Libby High School.

8. As a result of his inspection, Mr. Harris observed the following violations:

INSPECTIONS FOR FRIABLE ASBESTOS-CONTAINING MATERIALS

1. Please provide the following information about the local education agency:

NAME OF AGENCY: Libby Public Schools - District #4

CITY	COUNTY
Libby	Lincoln
STATE	**ZIP CODE**
Montana	59923

Please fill in the following information about the schools under the authority of this local education agency:

2. The number of schools which have been inspected for friable materials in accordance with §763.105 of Title 40 of the Code of Federal Regulations.	6
3. The number of schools where friable materials are present.	3

If the answer to question 3 is none, disregard questions 4 — 7 and go on to the certification. Otherwise, fill in the following information about the schools enumerated in question 3:

4. The number of schools in which all friable materials have been sampled and analyzed in accordance with §§763.107 and 763.109 of Title 40 of the Code of Federal Regulations.	3
5. The number of schools with friable material(s) that contain(s) asbestos.	3

If the answer to question 5 is none, disregard questions 6 — 7 and go on to the certification. Otherwise, fill in the following information about the schools enumerated in question 5.

6. The total area in square feet of all friable asbestos-containing materials found in these schools.	1,413
7. The total number of school employees who regularly work in schools where friable asbestos-containing materials are present.	82

CERTIFICATION: Please read and sign below the following statement:

I hereby certify that this local education agency has complied with the EPA regulation 40 CFR 763.100 through 763.117, "Asbestos-Containing Materials in Schools Identification and Notification," and that the information on this form is, to the best of my knowledge, true and complete.

SIGNATURE	TYPED OR PRINTED NAME
Bob Green	Bob Green
TYPED OR PRINTED TITLE	**DATE**
Maintenance Supervisor	5/7/86

Additional forms can be obtained by calling 800-424-9065 (554-1404 in the Washington, DC area).

EPA Form 7730-1 (6-82)

BILLING CODE 6560-50-C

§ 763.116 Compliance.

(a) Local education agencies shall comply with all parts of this regulation by May 27, 1983. Local education agencies that have already conducted detection activities should consult § 763.117 *Exemptions.*

(b) Actions undertaken by municipal or State officials on behalf of local education agencies as a part of a municipal or State school asbestos program shall constitute compliance with this regulation to the extent that such actions conform to the requirements of this regulation.

(c) Section 15(1) of TSCA (15 U.S.C. 2614) makes it unlawful for any person to fail or refuse to comply with any rule promulgated or order issued under section 6 of TSCA (15 U.S.C. 2605). Thus, failure to comply with any aspect of this rule constitutes a violation as defined by section 15(1) of TSCA.

(d) Section 16(a) of TSCA (15 U.S.C. 2615) provides that any person who violates any provision of section 15 shall be liable to the United States for civil penalties. If a violation is knowing or willful, criminal penalties may also be assessed. Under section 17 of TSCA (15 U.S.C. 2616), the Agency may take injunctive action to restrain persons from violating a rule promulgated under section 6 of TSCA.

763.117 Exemptions.

(a) *Schools that were inspected, sampled, and analyzed prior to this rule.* (1) Schools are exempt from §§ 763.105, 763.107, and 763.109, if, prior to the effective date of this rule, local education agencies, or municipal or State agencies, acting on their behalf, have:

(i) Visually inspected all areas of the school for friable materials.

(ii) Sampled each type of friable material found in the school, as distinguished by different appearance or texture.

(iii) Had the sample(s) analyzed using Polarized Light Microscopy supplemented by X-ray Diffraction where necessary, or by Electron Microscopy.

This exemption for previous sampling activity does not apply to school buildings where it was determined that a friable material does not contain asbestos based on fewer than three samples of the material.

(2) If a school was found to contain friable asbestos-containing materials, then §§ 763.111, 763.114 and 763.115, the recordkeeping and notification requirements, shall apply to the local education agencies.

(3) If a school was found to contain *no* friable asbestos-containing materials, the school also is exempt from §§ 763.111, 763.114, and 763.115, the recordkeeping and notification requirements, provided the school retains a copy of all laboratory reports and all correspondence with laboratories concerning the analyses of samples taken and maintains in the school record the following certifying statement, signed and dated by the person responsible for compliance with the rule: "I hereby certify that this school, to the best of my knowledge, does not contain friable asbestos-containing materials."

(b) *Schools which can document that no friable asbestos-containing building materials were used in construction, modification, or renovation.* A school is exempt from §§ 763.105, 763.107, and 763.109, the inspection, sampling, and analysis requirements, and §§ 763.111, 763.114, and 763.115, the recordkeeping and notification requirements, if:

(1) the school record contains documentation showing that, at the time of construction, modification, or renovation, no friable asbestos/containing building materials were used. To qualify for this exemption, documentation must clearly show that the friable materials used did not contain asbestos.

(2) the school record contains the following certifying statement, signed and dated by the person responsible for compliance with the rule: "I hereby certify that this school, to the best of my knowledge, does not contain friable asbestos-containing materials."

(c) *Other exemptions.* (1) Sections 763.105, 763.107, and 763.109 shall not apply to a school in which the record contains a signed statement certifying that any friable materials in the school shall be treated for purposes of this rule as asbestos-containing. In this case, the record shall also include information on the location of these materials.

(2) No provision of this subpart applies to any school if:

(i) The local education agency has conducted abatement programs that result in the elimination of all friable asbestos materials from the school either by removal or encapsulation of the materials.

(ii) No part of the school building was built before January 1979.

§ 763.119 References.

(a) *General.* The following reference contains detailed information on sampling and analysis of friable materials and provides a background on which this part is based. Copies may be obtained from the Document Control Officer, Management Support Division (TS-793), Office of Pesticides and Toxic Substances, Environmental Protection Agency, Room E-108, 401 M Street SW, Washington, D.C. 20460.

(1) USEPA. 1979. "Asbestos-Containing Materials in School Buildings: A Guidance Document" Part 1. (EPA no. C00090).

(2) [Reserved]

(b) [Reserved]

Appendix A—Interim Method of the Determination of Asbestos in Bulk Insulation Samples

Section 1. Polarized Light Microscopy

1.1 Principle and Applicability

Bulk samples of building materials taken for asbestos identification are first examined for homogeneity and preliminary fiber identification at low magnification. Positive identification of suspect fibers is made by analysis of subsamples with the polarized light microscope.

The principles of optical mineralogy are well established.[1,2] A light microscope equipped with two polarizing filters is used to observe specific optical characteristics of a sample. The use of plane polarized light allows the determination of refractive indices along specific crystallographic axes. Morphology and color are also observed. A retardation plate is placed in the polarized light path for determination of the sign of elongation using orthoscopic illumination. Orientation of the two filters such that their vibration planes are perpendicular (crossed polars) allows observation of the birefringence and extinction characteristics of anisotropic particles.

LIBBY PUBLIC SCHOOLS
111 EAST LINCOLN BLVD.
LIBBY, MONTANA 59923
406-293-6204

NOTICE

May 8, 1986

TO: ALL MAINTENANCE AND CUSTODIAL PERSONNEL AT CENTRAL MAINTENANCE, LINCOLN, CENTRAL AND ASA WOOD SCHOOLS

RE: PRESENCE OF FRIABLE ASBESTOS IN SCHOOLS

In accordance with EPA regulations Lincoln, Central (Mem. Gym), and Asa Wood schools have been inspected for friable asbestos, and it has been established that friable asbestos-containing material is present in the above-mentioned buildings mainly in the boiler rooms, on the pipes surrounding the boilers, and on the boilers proper.

A record of the inspection, and of the location of friable asbestos-containing materials, and a copy of relevant EPA regulations are available at the Libby Public School Central Maintenance Shop.

In order to comply with EPA regulations, you'll find enclosed a copy of EPA Form 7730-2 which is a guide for reducing asbestos exposure. We request that each one of you carefully read this form for your protection. Also, each custodian should post copy of this notice and Form 7730-2 on the bulletin board in the custodial area of your school.

BOB GREEN,
Maintenance Supervisor

BG:np

Encl.

A GUIDE FOR REDUCING ASBESTOS EXPOSURE

PURPOSE

Your school building contains materials which contain asbestos and may release fibers into the air. Breathing asbestos fibers is dangerous. This fact sheet tells how to reduce exposure to asbestos fibers. Please read it carefully.

PROTECTING YOURSELF FROM ASBESTOS

Some of the friable building materials in your school contain asbestos. Friable asbestos-containing materials crumble easily and release fibers into the air. Breathing these fibers may cause cancer and other diseases. The more asbestos you breathe, the greater your chances are of getting disease. You can take precautions that will reduce or eliminate the risk of being exposed to asbestos.

Find out from your supervisor where these friable asbestos-containing materials are in your building. Do not touch or disturb them unless you have to. If you must handle an asbestos-containing material, first lightly spray it with water. (EPA recommends using water which contains wetting agents, if they are available.) Wet asbestos-containing materials will not release as many fibers.

Even if friable asbestos-containing materials are not disturbed, they may release asbestos fibers, which will fall slowly to the floor. If you are cleaning in areas which contain these materials, do not use a broom: it will stir the fibers into the air. Do not use a vacuum cleaner unless it is equipped with a High Efficiency Particulate Absolute filter. The fibers are so small they can pass through an ordinary vacuum cleaner and out into the room.

When cleaning in areas which contain friable asbestos-containing materials, use dampened mops and dustcloths. Dampened mops and dustcloths will hold the fibers much better than dry mops and dustcloths, and will reduce the number of fibers put back into the air. It is best to use mops with disposable heads and to throw away the mop head after use. Otherwise fibers will be released as the mop dries. Use either lightly dampened mops or cloths or a vacuum with a High Efficiency Particulate Absolute filter to clean areas where wet mopping cannot be used (such as carpeting or hardwood floors).

Clean tables and chairs in the area with damp cloths. Do not dust them with brushes or with dry cloths, and do not vacuum them.

After you use the mop heads and cloths, put them in a plastic bag while they are still wet. Dislodged materials should also be placed in plastic bags for disposal.

A LIST OF IMPORTANT POINTS TO REMEMBER

1. Do not handle or disturb friable asbestos containing materials unless necessary.

2. If you must handle asbestos-containing materials, wet them first.

3. If you must disturb asbestos (for example, to repair a light), see your supervisor before starting work. Then:

   a. Place a plastic dropcloth below the work area.

   b. Spray asbestos-containing material with water before you disturb it.

   c. Make sure that only those persons who are necessary for the job are in the area.

   d. Put all the asbestos you remove into a heavy plastic bag. Seal the bag and discard it.

   e. After the job, clean all the ladders and tools you used with a wet cloth.

   f. Roll up the dropcloth carefully and put it in a plastic bag. Discard the bag.

   g. Clean the floor below the work area with a wet mop.

   h. Put the mop head and the cloth used to clean the ladders in a plastic bag while they are still wet, seal the bag, and discard it.

4. If you must disturb or remove large sections of asbestos-containing material, see your supervisor before you begin. The National Institute for Occupational Safety and Health recommends that a respirator approved for toxic dusts be worn during such work.

You should make arrangements to turn off the school's ventilation system if you are disturbing or removing large sections of asbestos-containing material. The ventilation system should remain off until the work is completed and the area has been cleaned.

EPA Form 7730-2 (8-82)

BILLING CODE 6560-50-C

(d) Local education agencies shall provide notice of the results of inspections and analyses in each school in which friable asbestos materials are found to the appropriate parent-teacher association of that school. If there is no parent-teacher association for the school, the local education agency shall notify directly the parents of its pupils.

§ 763.114 Recordkeeping.

(a) Local education agencies shall compile and maintain in the administrative office of each school under their authority a record which shall include:

(1) The name and address of the school.

(2) A list of all school buildings associated with the school, indicating whether each building has been inspected for friable materials in compliance with § 763.105, and which buildings contain friable materials.

(3) Copies of the Notice to School Employees, found in § 763.111(a).

(4) For each school building which contains friable materials:

(i) A blueprint, diagram, or written description of the building which identifies clearly the location(s) and approximate area(s) in square feet of each sampling area of such material(s), the locations at which samples were taken, and the identification number of each sample, and which shows or describes clearly whether each sampling area of friable material contains asbestos, including an estimate of its percent asbestos content as determined by calculating the average of the percent asbestos contents of all samples taken in that area.

(ii) A copy of all laboratory reports and all correspondence with laboratories concerning the analysis of samples taken in accordance with § 763.107.

(5) If the school contains friable asbestos-containing materials, copies of the "Guide for Reducing Asbestos Exposure" contained in § 763.111(b), and one copy of "Asbestos-Containing Materials in School Buildings: A Guidance Document," Parts 1 and 2 (EPA No. C00090), which can be obtained by calling 800–424–9065.

(6) A statement that the requirements of the rule have been satisfied signed by the person responsible for compliance with the rule and including the date and the person's name and title.

(b) Each local education agency shall retain in the administrative office of the agency:

(1) A list of all schools under its authority, indicating whether schools were inspected in accordance with § 763.105, and which schools contain friable materials.

(2) A record of the friable materials in schools which were sampled and analyzed in accordance with §§ 763.107 and 763.109, indicating which materials contain asbestos.

(3) For each school which contains friable asbestos-containing materials, the total area of such materials in square feet, and the total number of school employees who regularly work in the school.

(c) *Form.* Each local education agency shall complete and retain in the administrative office of the local education agency the following form "Inspections for Friable Asbestos-Containing Materials."

BILLING CODE 6560-45-M

LIBBY PUBLIC SCHOOLS
111 EAST LINCOLN BLVD.
LIBBY, MONTANA 59923

406-293-6204

N O T I C E

May 5, 1986

TO: ALL STUDENTS AND EMPLOYEES OF CENTRAL SCHOOL

RE: PRESENCE OF FRIABLE ASBESTOS IN CENTRAL SCHOOL

In accordance with EPA regulations Central School has been inspected for friable asbestos, and it has been established that friable asbestos-containing material is present in the boiler room on the pipes surrounding the boiler, and on the pipe in the southwest corner of Memorial Gymnasium in small amount.

A record of the inspection, and of the location of friable asbestos-containing materials, and a copy of relevant EPA regulations are available at the Libby Public Schools Central Maintenance Shop.

The asbestos has been present in the buildings for many years, and the exposure to students or staff over the years is probably minimal due to its location in the boiler room and its covering. However, like in many schools throughout the United States we must now encapsulate (seal with a special sealant) and notify you of the presence of asbestos. We have been working with the EPA for several months in complying with the recommendations and are now completing the final steps.

No action is required by students or parents, only by the school in notifying you.

Bob Green

BOB GREEN,
Maintenance Supervisor

BG:np

LIBBY PUBLIC SCHOOLS
111 EAST LINCOLN BLVD.
LIBBY, MONTANA 59923

406-293-6204

N O T I C E

May 5, 1986

TO: ALL STUDENTS AND EMPLOYEES OF ASA WOOD SCHOOL

RE: PRESENCE OF FRIABLE ASBESTOS IN ASA WOOD SCHOOL

In accordance with EPA regulations Asa Wood School has been inspected for friable asbestos, and it has been established that friable asbestos-containing material is present in the boiler room on the pipes on and around the boiler and on the boiler itself.

A record of the inspection, and of the location of friable asbestos-containing materials, and a copy of relevant EPA regulations are available at the Libby Public Schools Central Maintenance Shop.

The asbestos has been present in the buildings for many years, and the exposure to students or staff over the years is probably minimal due to its location in the boiler rooms and its covering. However, like in many schools throughout the United States we must now encapsulate (seal with a special sealant) and notify you of the presence of asbestos. We have been working with the EPA for several months in complying with the recommendations and are now completing the final steps.

No action is required by students or parents, only by the school in notifying you.

Bob Green

BOB GREEN,
Maintenance Supervisor

BG:np

Ed Green

April 17, 1986

Teresa N. Lukas,
Assistant Region Council
U. S. EPA Region VIII
999 18th Street
One Denver Place
Suite 1300
Denver, CO 80202-2413

Dear Terry,

I am enclosing a letter from Tom Harris to my Maintenance Supervisor regarding the use of a product for appropriate containment of the asbestos in question.

Mr. Green is currently contacting a firm, will order the material in, and we will install it upon its arrival.

I am assuming that I should hold off on the consent agreement until, in fact, we have completed the project. If I am in error, please notify me and I will sign off the consent agreement and send it to you.

Thank you.

Sincerely,

Robert J. Pratt,
Superintendent of Schools

jh

Enclosure

United States
Environmental Protection
Agency

Region 8, Montana Office
Federal Building
301 S. Park, Drawer 10096
Helena, Montana 59626-0096

EPA

REF: 8MO

Mr. Bob Green
Maintenance Supervisor
Libby Public Schools
111 East Lincoln Blvd.
Libby, Montana 59923

Dear Mr. Green:

This is in response to your letter of April 4, 1986 concerning the use of Foster Bridging Encapsulant 32-32, manufactured by Fuller Company of Houston, Texas.

This product has been tested for EPA by Battelle Corp., Columbus, Ohio, and found to be marginally acceptable for use as an encapsulant; the product was tested under the Fuller number 1583. Product No. 1583 and Product No. 32-32 are one and the same.

It is my understanding that you will be using the product to treat pipe lagging which is in sound condition. For this application, the product is acceptable.

Sincerely,

Thomas O. Harris
Environmental Scientist

April 4, 1986

Mr. Tom Harris
Environmental Protection Agency
Federal Building - Drawer 10096
301 S. Park
Helena, MT 59626

Re: Encapsulants for asbestos-containing materials

Dear Mr. Harris,

This is in reference to our phone conversation of March 6 and your letter dated March 12, 1986 pertaining to the above subject.

I have received your list of EPA-approved encapsulants on March 17, 1986, and have contacted the H. B. Fuller Co. of Springhouse, PA. In the meantime I have received literature on product No. 1583 (43-A) for bridging encapsulant from the above company; copy is enclosed for your information.

I would appreciate it verymuch, if you could send me a letter of approval on the above encapsulant as soon as possible, so that we can order the product and get started on bridging the asbestos in our schools.

Thank you for your cooperation in this matter.

Sincerely,

BOB GREEN,
Maintenance Supervisor

BG:np
Encl.

cc: Bob Pratt, Superintendent w/encl.
Bill Olson, Business Manager w/encl.

Foster®

PRODUCT DATA

32-32

COATINGS • SEALANTS • ADHESIVES

PROPERTIES

COLOR
White

APPLICATION CONSISTENCY
Airless Spray

WEIGHT PER U.S.GALLON(ASTM D1475-60)
11.4 pounds (1.37 kg/liter)

AVERAGE NON-VOLATILE(ASTM D1644-75)
63% by weight
49% by volume

SERVICE TEMPERATURE LIMIT(FSTM 70)
0°F to 170°F

COVERAGE RANGE(FSTM 71)
Subject to the nature of material being coated.
Wet coverages shown are for smooth non-porous surfaces. Porous or rough textured insulation will require higher gallonage to obtain required dry thickness.
Dry Thickness: 0.025 inch (.071 mm)
Equivalent Wet Coverage: 0.051 inch(1.40mm)
3.2 gallons per 100 sq.ft.(1.41 liters/m^4)

ODOR
Mild when wet
None when dry

SAFETY
WET FLAMMABILITY (ASTM D3243-73)
No flash to boiling,205F (96.1C)
SURFACE FLAME SPREAD (ASTM E-84-76a)
Flame Spread..... 10
Fuel Contributed.... 0
Smoke Developed..... 5
Applied to 1/4-inch Asbestos Cement Board. Flame spread may vary at different product thicknesses and/or when applied over surfaces other than asbestos cement board.
SURFACE FLAME SPREAD (ASTM E-162)
21 on 1-inch (2.54cm) sprayed mineral wool insulation. The flame spread may vary at different product thicknesses and/or when applied over surfaces other than sprayed mineral wool fiber.

FOSTER BRIDGING ENCAPSULANT

ASBESTOS-FREE

Foster Bridging Encapsulant is a pigmented, single component, water base elastomeric product, for use over fibrous and cementitious types of asbestos insulation.

Foster Bridging Encapsulant has been extensively tested by an independent testing laboratory for the U.S.Environmental Protection Agency and has been included on the list of recommended products (Lab Test #33775-43-A) found acceptable for asbestos containment.

Foster Bridging Encapsulant is easily spray applied and after curing forms a tough, durable, elastomeric film over the asbestos insulation effectively locking in or encapsulating the friable asbestos fibers.

Foster Bridging Encapsulant can be applied t previously painted insulation surfaces. It can also be used over the hard non-absorptive types of asbestos insulation that would not absorb or "accept" a penetrating type encapsulant.

Foster Bridging Encapsulant can also be usec with glass cloth as a lagging adhesive and coating to seal asbestos-containing pipe covering and boiler lagging insulations.

Foster Bridging Encapsulant meets building interior occupancy requirements of most building codes used in the U.S.A.

2/82-2
Revised

H.B. Fuller Company
Foster Products Division

6107 Industrial Way
Houston, Texas 77011

FOSTER BRIDGING ENCAPSULANT

32-32

Foster Bridging Encapsulant was developed for two coat application by airless spray technique. Coverage rate will be dependent on surface texture of the insulation. Generally coverage per coat varies from 1.5 to 2.0 gallons per 100 sq. ft.

MATERIAL PREPARATION

Stir well but do not use sticks or boards which would splinter or otherwise contaminate product. Do not thin.

SPRAY EQUIPMENT

Any of the following GRACO pumps (or their equivalent) can be used to spray Foster Bridging Encapsulant.

Pumps: EH-333
EH-433
GH-433
GH-533

Hose: 3/8 inch i.d. minimum

Gun: GRACO Silver or Golden Hydramastic guns with a Reverse-A-Clean tip assembly.

Tip Size: .019 to .029. Fan size (first digit) is usually a 4 to 6 depending on applicator's preference.

CLEAN-UP

Water - (wet)

Dry - (Methylene Chloride)

LIBBY PUBLIC SCHOOLS
111 EAST LINCOLN BLVD.
LIBBY, MONTANA 59923

406-293-6204

March 3, 1986

Asa Wood School,
700 Idaho Ave.
Libby, MT 59923

Friable asbestos has been found in the boiler room and on the pipes on and around the boiler, and also on the boiler itself.

The approximate sq.ft. is 238.

Bob Green

BOB GREEN,
Maintenance Supervisor

LIBBY PUBLIC SCHOOLS
111 EAST LINCOLN BLVD.
LIBBY, MONTANA 59923

406-293-6204

March 3, 1986

Memorial Gym (Lincoln School)
111 E. Lincoln Blvd.
Libby, MT 59923

Friable asbestos has been found on the pipe in the southwest corner of the gym.

It is approximately 45 sq.ft. in size. The gym itself is approximately 8,358 sq.ft. in size.

Bob Green

BOB GREEN,
Maintenance Supervisor

LIBBY PUBLIC SCHOOLS
111 EAST LINCOLN BLVD.
LIBBY, MONTANA 59923

406-293-6204

March 3, 1986

Lincoln School
111 E. Lincoln Blvd.
Libby, MT 59923

Asbestos has been found in this building. Friable asbestos has been found on steam pipe covering in most every room. Each room is approximately 657 sq.ft. in area. Friable asbestos is approximately 19.72 sq.ft. in each room.

Friable asbestos has been noted in the boiler room on the boiler and pipes. Sq.Ft. of friable asbestos is approximately 605 sq.ft. in area.

Bob Green

BOB GREEN,
Maintenance Supervisor

LIBBY PUBLIC SCHOOLS
111 EAST LINCOLN BLVD.
LIBBY, MONTANA 59923

406-293-6204

March 3, 1986

CENTRAL SCHOOL
111 E. Lincoln Blvd.
Libby, MT 59923

Central school has friable asbestos in the basement in the boiler room on the pipes surrounding the boiler itself.

There is approximately 229 sq.ft. of asbestos.

Bob Green

BOB GREEN,
Maintenance Supervisor

file

February 6, 1986

Environmental Protection Agency
Federal Building - Drawer 10096
301 S. Park
Helena, MT 59626
ATTN: Mr. Tom Harris

Re: Asbestos in Libby Public Schools

Dear Mr. Harris:

In regard to our recent phone conversation concerning the asbestos in our schools, you suggested that we contact a boiler company about covering the asbestos.

We contacted Northwest Boiler, in Spokane, Washington, and they suggested that we paint the asbestos with MEI 44-20 (spec. is enclosed) in the following areas discussed during our conversation:

Lincoln Boiler Room
Central School Boiler Room
Lincoln Gymnasium (Memorial Gym).

We would like to hear from you at your earliest convenience, if the above mentioned paint would be satisfactory to cover the asbestos in our schools.

Yours truly,

BOB GREEN,
Maintenance Supervisor

ENCL.

BG:np

cc: Mr. Robert Pratt
Mr. Bill Olson

MISSOULA CITY-COUNTY HEALTH DEPARTMENT

January 22, 1986

Bob Green, Maintenance Supervisor
Libby Public Schools
111 E. Lincoln Blvd.
Libby, MT 59923

Dear Mr. Green:

Of the nine samples you sent the Department's lab for asbestos analysis, eight contained one or more kinds of asbestos fibers. The sample location, kind of asbestos and estimated asbestos content are as follows:

Sample No.	Location	Kind of Asbestos	Estimated Amount
1	Lincoln Kitchen	Chrysotile	approx 50%*
2	Lincoln Comm Ed Office	Chrysotile	approx 50%*
3	ASA Wood Boiler Room	Chrysotile	approx 50%*
4	Lincoln Classroom 11	Chrysotile	approx 50%*
5	Lincoln Classroom 13	Chrysotile	approx 50%*
6	Lincoln Boiler Room	Chrysotile and Amosite	approx 40%total**
7	Central School Boiler Room	Chrysotile and Amosite	approx 40%total**
8	Lincoln Gym	same as 6 & 7	same as 6 & 7 **
9	Libby High School Boiler Room	none	none

*The chrysotile fibers are bound in a tightly woven matrix which makes them relatively non-friable and easy to seal or otherwise contain.

**This combination of chrysotile and amosite, in a very loosely bound matrix, makes this material exceeding friable and much more difficult to contain or remove safely.

I strongly suggest that you contact Mr. Tom Harris at the State EPA office in Helena (449-5486) for his advice on how best to handle the asbestos in your schools, especially Nos. 6 and 7, and 8.

If you have questions regarding this report, please give me a call at 721-5700 x 366.

The charge for the asbestos analysis is $22.00 per positive sample, for a total of $176.00, payable to the Missoula County Health Department.

Sincerely,

Linda Hedstrom

Linda Hedstrom
Microscopist

LH:jj

File

March 10, 1986

TO: BOB PRATT, Superintendent

RE: ASBESTOS IN SCHOOLS

Dear Bob,

Inspection of the Libby Public Schools for asbestos was performed on May 22, 1985 by Mr. Tom Harris of the state EPA office. At that time Mr. Harris found asbestos to be in the Central building, Lincoln building, Memorial Gym, Asa Wood School boiler room, and the High School boiler room.

On January 8, 1986 I sent samples to Linda Hedstrom of the Missoula County Health Department on recommendation by Terry Lucas of the EPA office in Denver, Colorado.

On January 27, 1986 I received a letter from Linda Hedstrom (Microscopist), suggesting that I contact Mr. Harris of the state EPA office in Helena for his advice on how best to deal with the asbestos in our schools.

On January 28, 1986 I phoned Mr. Harris to inquire how to seal the asbestos in our schools. Mr. Harris suggested that I contact a boiler company to see if they would have a sealant for the asbestos. I contacted Northwest Boiler in Spokane, Washington, and they in turn sent me literature on paint suitable for sealing asbestos. I then forwarded the paint spec. sheet to Tom Harris in Helena for approval - this was done on February 6, 1986.

I did not hear any further from Tom Harris until March 6, 1986 by phone. He said that he did not approve of the paint from Northwest Boiler, and would send me a list of approved EPA sealants. At this point in time I am awaiting the list of sealants, so that we can seal the asbestos in our schools.

On February 7, 1986 I filled out EPA forms 7730-2 and 7730-3, along with a written notice of the location and the amount of asbestos in the respective schools. The EPA forms and written notices are in the Admin. Offices, Teachers' Lounges, and in the Custodial Rooms. All copies of EPA forms, lab. reports, and written notices are in my office on file.

BG:np

BOB GREEN,
Maintenance Supervisor

file

January 8, 1986

Linda Hedstrom
Missoula County Health Department
301 West Alder
Missoula, MT 59801

Dear Linda,

Enclosed you will find samples in 35 mm film containers taken in the locations indicated on the labels, as requested by the EPA.

This is in response to our telephone conversation on January 3, 1986 for testing of friable asbestos material.

Thank you for your attention to the above matter.

Yours truly,

BOB GREEN,
Maintenance Supervisor

BG:np

Encl.

cc: Bob Pratt - Superintendent
Bill Olson - Business Manager